

111395

Docket Management Facility
U.S. Department of Transportation
Room PL-401
400 7th Street, S.W.
Washington, D.C. 20590-0001

DEPT. OF TRANSPORTATION
DOCKETS

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September 21, 2000

**COMMENTS OF CONSUMERS UNION
to the
DEPARTMENT OF TRANSPORTATION
on the
COMPUTER RESERVATIONS (CRS) REGULATIONS
SUPPLEMENTAL ADVANCE NOTICE OF PROPOSED RULEMAKING**

Re: Docket No. OST-97-2881; OST-97-3014, OST-98-4775
Computer Reservations System (CRS) Regulations

INTRODUCTION

These comments are submitted by Consumers Union¹ regarding the Supplemental Advance Notice of Proposed Rulemaking ("SANPR")² in the above docket. In 1997, the Department of Transportation ("DOT" or "the Department") issued an Advance Notice of

¹ Consumers Union is a nonprofit membership organization chartered in 1936 under the laws of the State of New York to provide consumers with information, education and counsel about good, services, health, and personal finance; and to initiate and cooperate with individual and group efforts to maintain and enhance the quality of life for consumers. Consumers Union's income is solely derived from the sale of *Consumer Reports*, its other publications and from noncommercial contributions, grants and fees. In addition to reports on Consumers Union's own product testing, *Consumer Reports* with approximately 4.5 million paid circulation, regularly carries articles on health, product safety, marketplace economics and legislative, judicial and regulatory actions which affect consumer welfare. Consumers Union began publication of *Consumer Reports Travel Letter* in 1985. *Consumer Reports Travel Letter* has a paid circulation of approximately 145,000, and provides information and advice to consumers on issues involving airlines, cruise lines, hotels, rental cars and other travel related products and services. Consumers Union's publications carry no advertising and receive no commercial support.

² 65 Fed. Reg. 45,551 (July 24, 2000).

Proposed Rulemaking (“ANPR”),³ in order to determine if it should continue or modify its existing rules governing airline computer reservation systems (“CRS”). In its current SANPR, DOT has requested updated comments relating to its ANPR, and inquires whether it should adopt any rules covering the distribution of airline services through the Internet. In addition, DOT has requested comment on whether it should alter its CRS rules due to the diminishing control of CRSs by airlines.

DISCUSSION

Below are the comments of Consumers Union relating to the above issues. Section I of these comments addresses the general need for additional regulation in this area. In Section II of these comments, we present responses to those specific questions within the SANPR for which we have information or views. The questions stated in the Federal Register are repeated in bold type.

I. ADDITIONAL MEASURES NECESSARY TO INCREASE COMPETITION

It is crucial to air travelers that DOT promulgate new CRS rules that impose a non-bias requirement on all systems engaged in searching and booking passenger air travel arrangements. The ready availability of accurate and unbiased information on available air travel tickets is essential to price and service competition in the air travel industry.

³ 62 Fed. Reg. 47,606 (September 10, 1997).

The passenger airlines industry is not a highly competitive industry. Many city-to-city routes are dominated by a single carrier. This is made possible by a hub and spoke structure of connections and a stranglehold by the one or two major carriers in each hub city that hold the long-term rights to the airport landing slots and boarding gates that are necessary to engage in the business of air passenger carriage. The lack of competition is further enhanced by the major carriers' opportunistic pricing practices and by aggressive responses to discount carriers that are inevitably followed by higher prices when these actions are successful in eliminating discount competition.

Existing competition is dependent on, among other factors, accurate and unbiased information regarding available air travel tickets. Biased or inaccurate information is a major barrier to price competition. Consumers Union views this DOT proceeding, if it is to be successful in promoting competition, as necessarily focused on improving the quality of consumer information. As indicated below, we view the Department as having ample authority to require that all parties that engage in the search, display and sale of airline tickets present such information in a manner unbiased by either search engine software design or other practices that may prevent consumers from obtaining accurate information in response to their inquiries about ticket availability and booking.

The travel agency market is integrally related to the air passenger carriage market. We urge the Department to reject any analysis suggested by carriers and/or travel agencies that would treat the travel agency market as separate and distinct from the air passenger carriage market, or that focuses on increasing competition (or the number of competitors) in the travel agency market as distinct from the air passenger carrier market.

The travel agency market does, of course, also serve consumers by identifying and booking non-airline travel services (hotels, resorts, rental cars and other transportation services, and entertainment). However, in the context of this proceeding, it is adjunct to and highly interactive with the airline passenger carriage market. As indicated below, modernized CRS rules must take into account the interdependency and economic interactions of these two markets.

Consumers Union does not accept the proposition that travel agencies that are free of air carrier investment should operate under more lenient rules than those imposed upon carrier-owned agencies. Furthermore, Internet agencies that seek freedom from rules fostering honest competition make a seriously flawed argument. The advertising revenues, rates of commission and special ticket availability arrangements all serve as potential economic incentives to bias the presentation of fare information to the consumer for the purpose of booking contracts of carriage. If information is not presented in an unbiased manner, price competition in air passenger carriage will be further suppressed, regardless of ownership and regardless of venue.

Consumer Reports Travel Letter Article and Study of On-line Travel Sites.

The October 2000 issue of *Consumer Reports Travel Letter* features the lead article “Travel Websites: look around before you book.” A copy of the article is attached to these comments at Tab 1, and a summary of the underlying study and summary charts are attached at Tab 2.

The *Consumer Reports Travel Letter* study clearly documents that current on-line travel agencies do not easily, fairly, and thoroughly deliver the accurate, unbiased information needed to enhance competition in air travel bookings. The travel options

generated by these sites for the *Consumer Reports Travel Letter* study were incomplete, and *may* have been the result of bias resulting from economic incentives created by the carriers. Some fares listed were unavailable when booking was attempted, and many trips pulled up in the search were not in accordance with the requester's travel parameters. Others simply were not viable in terms of travel convenience. These results may be the result of website incompetence. Or they may reflect bias.

In an unregulated environment, consumers have no assurance that data on travel websites is not being omitted because of deals with the airlines. As the *Consumer Reports Travel Letter* article states:

One key concern is that the low-fare, viable flights selected by [the DOT regulated CRS] in our tests were not offered at all by some web sites, regardless of ordering. *Travel Letter* at 7.

In either event, these omissions constitute an information barrier to competition. Offering low and convenient fares is not a viable competitive marketing strategy if consumers cannot readily compare carrier proposals and select the low, convenient offers. Unbiased *and* orderly placement of information is necessary and is key to the selection of competitively priced fares.

The conclusions reached by *Consumer Reports Travel Letter* are supported by the opinions of a vice president of Northwest Airlines,⁴ Al Lenza, as quoted in the article. He indicates that what consumers see at on-line travel sites is "some low fares, but not all low fares." He also indicates that these websites seek preferential commissions in

⁴ Northwest Airlines is one of five major U.S. carriers who are investors in Orbitz, a rival travel booking site scheduled to launch in June 2001.

exchange for preferential carrier status. Such arrangements may be to the mutual benefit of website and carrier, but certainly do not benefit consumers. Incomplete low-fare information and preferential information presentation is anticompetitive. It creates economic incentives that work against deep discounting of airfares. We urge the Department to take these concerns into account in promulgating its final, revised CRS rule.

We are also concerned with the potential for the presentation of biased information by off-line travel agencies. A ticket agent that serves as an intermediary between the CRS or airline in-house search system search results and the consumer also has the potential for biased presentation. Airline ticketing personnel and independent agency personnel have some of the same incentives as on-line agencies to present the search information in a biased manner if not subject to non-bias rules. As the *Consumer Reports Travel Letter* article states:

Note, however, that a CRS is only as good as the travel agent who uses it: If the agent receives incentives for booking a particular airline, then his or her recommendations may not reflect the unbiased listing. *Travel Letter* at 6.

Consumers Union believes that all sellers of tickets, regardless of legalistic agency relationships, should operate under the same non-bias rules.

II. RESPONSES TO QUESTIONS POSED IN THE SANPR

1. **Whether section 411 authorizes us to regulate the conduct of a system that is not owned, controlled, or marketed by an airline or airline affiliate?** 65 Fed. Reg. at 45,556.

Consumers Union believes that it is crucial to air travelers for DOT to promulgate new CRS rules that impose a non-bias requirement on all systems engaged in searching and booking passenger air travel arrangements. Furthermore, it is our belief that the only way in which the Department can prevent airlines from seeking *or obtaining* preferential displays is to impose a modernized CRS fairness rule on *all* sellers of tickets.

The Department clearly has the authority to regulate the conduct of systems that are not “owned, controlled, or marketed” by an airline or an airline affiliate, so long as the system serves as a “ticket agent.” More specifically, as discussed below, DOT has the authority to prevent all ticket agents from engaging in unfair or deceptive practices in the sale of air transportation.

Under the Aviation Act, all sellers of tickets fall within the definition of “ticket agent,” and may, as such, be regulated by DOT. The term “ticket agent” is broadly defined under the Act as:

a person (except an air carrier, a foreign air carrier, or an employee of an air carrier or foreign air carrier) that as a principal or agent sells, offers for sale, negotiates for, or holds itself out as selling, providing, or arranging for, air transportation. 49 U.S.C. § 40102(a)(40).

Section 411 of the Aviation Act prohibits deceptive acts and practices in the sale of transportation. See 49 U.S.C. § 41712. Under this section, the Secretary of Transportation (“Secretary”) may investigate and decide whether “an air carrier,

foreign air carrier, **or ticket agent** has been or is engaged in an unfair or deceptive practice or an unfair method of competition in air transportation **or the sale of air transportation.**” (emphasis added). 49 U.S.C. § 41712(a). If the Secretary finds, after notice and the opportunity for a hearing, that the entity is engaged in an unfair or deceptive practice or unfair method of competition, the Secretary must issue a cease and desist order against that party. See 49 U.S.C. § 41712(a).

While section 411 specifically empowers the Secretary to issue cease and desist orders, section 204(a) of the Aviation Act, 49 U.S.C. § 40113(a),⁵ gives the Secretary the authority to promulgate regulations prohibiting specific unfair or deceptive practices or unfair methods of competition in the sale of air transportation.

Section 204(a) of the Aviation Act, “General authority,” states that:

the Secretary of Transportation (or the Administrator of the Federal Aviation Administration with respect to aviation safety duties and powers designated to be carried out by the Administrator) may take action the Secretary or Administrator, as appropriate, considers necessary to carry out this part [49 USCS § 40101 *et seq.*], including conducting investigations, **prescribing regulations**, standards, and procedures, and issuing orders. (emphasis added) 49 U.S.C. § 40113(a).

Under section 204(a), the Secretary has the authority to issue regulations to enforce the prohibitions, found in section 411, against unfair or deceptive practices or unfair methods of competition in the sale of air transportation. See United Air Lines, et al., v. Civil Aeronautics Board, et al., 766 F.2d 1107 (7th Cir. 1985) (Court upheld regulations issued by the Civil Aeronautics Board (precursor to the FAA), pursuant to section 411,

⁵ This is former section 1324(a) of the Title 49. The authority for this section was transferred to DOT from the now-defunct former Civil Aeronautics Board (“CAB”). Former Title 49 sections were revised by Acts on October 17, 1978, and January 12, 1983.

including a rule forbidding airlines to bias their computerized reservation systems). In United Air Lines, United Airlines and other carriers questioned how DOT rules prohibiting bias could be promulgated pursuant to section 411, a rule prescribing procedures for investigations and cease and desist orders. United Airlines argued further that the section that provided for the promulgation of regulations, section 204(a), allowed the Secretary to make only rules “pursuant to and consistent with the provisions’ of the Act.” Id. at 1111. The Court disagreed, and explained that “Section 411 announces a policy against unfair or deceptive practices and unfair methods of competition, and while at the same time it creates an adjudicative procedure for enforcing that policy, nothing in the Act indicates that it is the exclusive procedure.” Id. More importantly, the Court specifically stated that section 204(a) empowered the Board to make rules “designed to carry out policies set forth elsewhere in the Act – in section 411, for example.” Id.

For these reasons, we view the Department as having ample authority to require that all parties engaged in the search, presentation and sale of airline tickets present such information in a manner unbiased by either search engine software design or other practices that may prevent consumers from obtaining accurate information in response to their inquiries.

2. Whether our determinations that the system practices prohibited by our rules are unfair methods of competition are still valid, when those determinations relied on the systems’ control by airlines that competed with airlines dependent on the systems for distribution. 65 Fed. Reg. at 45,556.

CRS practices prohibited by the current CRS rules are unfair methods of competition, regardless of whether the systems are owned by the airlines or are

independent of airline ownership. Independent search engines and independent sellers of tickets, as well as airlines and airline-related sellers, may benefit economically at the expense of consumers when ticket information regarding proposed bookings is presented on a basis calculated to maximize a ticket seller or booking agent's revenues or profits, rather than to provide prospective travelers with the most economical contracts of carriage. The provision of search engine services and the booking of airline tickets are secondary (and often vertically integrated) service markets – they service the primary market of air carriage. Independent search engines' and sellers' presentation of information on any basis other than customer benefit can still be manipulated by the carriers through contractual arrangements with these secondary service providers. That is, the carriers can still manipulate the presentation of information through commission and advertising arrangements, so that the most competitive offers are not as easily found or selected by the prospective customer. In a market in which an effective information search is a major barrier to price/service competition, the presentation of biased information by any search engine or ticket sellers should be deemed to be an unfair practice.

3. Whether CRS rules remain necessary and, if so, the basis for our maintenance of such rules as to systems that would have few, if any, affiliations with airlines? 65 Fed. Reg. at 45,556.

CRS rules remain necessary. The evolution of Internet travel agencies, since the rules' adoption, has resulted in additional venues through which the major carriers can manipulate consumers to purchase contracts of carriage that are not the most competitive.

The October 2000 *Consumer Reports Travel Letter* article “Travel Websites: Look Around Before You Book” documents the difficulty that consumers have in using the Internet to identify and book the most competitive offers. An analysis of the search and booking markets as separate markets may suggest that this is not an issue of competition in the air carriage market. However the analysis, suggested above, of these markets as closely interrelated with the passenger carriage market shows that because the rules do not require all sellers of tickets to present unbiased information, consumers will not find the most competitive offers and the cost of an effective information search will remain a barrier to competition. When consumers cannot readily identify and book the most competitive offers, the anticompetitive effect of the information problem is clear.

4. Whether the rules, if any, should be the same for each system regardless of the degree of its ties with one or more airlines? 65 Fed. Reg. at 45,556-57.

The Department should adopt rules that govern all CRSs, regardless of the degree of a given system’s ties with carriers. Carriers remain able to influence the bias of information presentation through advertising and commission practices. In the case of information presentation influenced by rates of commission or other carrier-determined incentives, it will be even more difficult for consumers to detect the bias that influences the presentation of ticket information. Consumers Union believes that, in order for competitive pricing to discipline the air carriage market, the information presentation must be unbiased, and that this outcome is only partly related to whether carriers control

any or all search engine or reservations systems. We further believe that the elimination of bias will not occur without a regulation equally applied to all systems.

5. Potential problems could perhaps be alleviated by barring airlines from seeking or obtaining preferential displays or discriminatory fees. If justified by the record, we could impose a similar ban on airlines with respect to system services provided travel agencies. We ask whether such a regulation would adequately resolve any potential problems that might arise from the operation of systems that have no airlines or airline affiliates as owners or marketers? Conceivably certain types of contract clauses in agreements between travel agencies and a system could also be prohibited as agreements analogous to contracts that unreasonably restrain trade in violation of section 1 of the Sherman Act. 65 Fed. Reg. at 45,557.

The only way in which the Department can prevent airlines from seeking *or obtaining* preferential displays is to impose a modernized CRS fairness rule on *all* sellers of tickets. Otherwise, airlines will continue to receive preferential displays based on advertising, preferred rates of commission and other economic incentives, regardless of whether they seek such treatment explicitly. The Department clearly indicates in its SANPR, and in this particular question, that it is reluctant to impose broad and comprehensive regulations. However, Consumers Union does not believe that incremental measures, such as banning or regulating particular incentives for favored treatment given by carriers to reservations systems, will suffice. As quickly as the Department can identify and address existing incentives for preferential displays, the major carriers will develop new forms. The October 2000 *Consumer Reports Travel Letter* article indicates a failure on the part of travel booking sites, unaffiliated with airlines, to find and present information on some of the most economical consumer options. Whether this is due to faulty search technology or to incentives from particular

carriers is impossible to discern. However, economic incentives cannot be discounted as a motive. The quickest, most certain, and most pro-competitive measure possible is to impose, from the outset, a clear rule requiring unbiased displays, and to apply that rule to *all* search engines and booking agents. The entire non-competitive history of the air passenger transportation industry suggests that promises, informal guidelines and bland promises made by air carriers to do well by travelers will not accomplish the goals of competition and fair treatment for consumers.

6. Whether there is a significant risk that some practices associated with the use of the Internet are likely to reduce competition in the airline industry or result in consumers obtaining incomplete or misleading information? The relevant questions may include the following: whether airlines are able to participate in on-line services on reasonable terms, whether consumers have a reasonable opportunity to obtain non-deceptive information on airline services and to make bookings, and whether the Internet's use presents questions about the competitiveness of the airline and distribution industries? 65 Fed. Reg. at 45,557.

The results of the October 2000 *Consumer Reports Travel Letter* article indicate that consumers do not reliably get the information they need to select the most competitively-priced air travel tickets through Internet searches. To the extent this is true, the inaccuracy of the information impedes price competition. We cannot state with certainty the degree to which the misinformation stems from poor search and data presentation programs or the degree to which it may be influenced by incentives for biased display, such as advertising and rates of commission. Certainly, to the extent that advertising and rate of commission practices may influence the presentation of ticket search results, they adversely affect competition. The information reported in the *Consumer Reports Travel Letter* article justifies Departmental measures to correct this

situation, based on the Department's authority to promote competition and to prevent unfair and deceptive practices in the airline industry.

7. Various parties have alleged in their comments that the operation of websites by travel agencies and the systems creates a potential for abuse, since the site operator may be induced to bias its displays of airline information. Our CRS rules currently apply to system services provided to websites operated by travel agencies . . . but, as noted above, do not govern the use made by travel agencies of the information and displays made available by a system. Commenters should also state whether any travel agency websites are currently biased or provide deceptive information and, if so, provide supporting evidence. 65 Fed. Reg. at 45,557.

As discussed above, Consumers Union believes that all rules governing CRSs should apply equally to on-line ticket sellers. The October 2000 *Consumer Reports Travel Letter* article highlights the likelihood that some travel websites bias their displays in favor of certain airlines in exchange for advertising revenue. In addition, some travel web sites use CRSs to provide them with flight data, and then reorder the information. See Travel Letter at 9.

Searches on all four on-line sites failed to list certain airlines with viable itineraries. On Lowestfare, many TWA flights with inconvenient itineraries (obtained through a contract fare deal) repeatedly were listed first. On the Travelocity site, advertised airlines dominated flight listings. See Travel Letter at 8. The Travelocity site also promoted "featured airlines," for which links were provided within full-page advertisements. However, testing revealed that the flights provided through these links

usually did not provide the lowest fare. *See Travel Letter* at 9. Al Lenza, vice president of Northwest Airlines,⁶ addressed this issue when interviewed for the article. He stated:

The effect is, you will get some low fares, but not all low fares. We're very concerned about that. They want to charge us overrides [bonus commissions]. They claim they can give us more business. That means some of it is biased.... [Airlines] are getting more than just banner ads for their money. *Travel Letter* at 9.

8. Parties contending that additional rules are necessary for Internet services should explain why on-line agencies should be treated differently than traditional agencies. 65 *Fed. Reg.* at 45,557.

Consumers Union does not contend that additional (*i.e.*, different) rules should obtain for on-line travel agencies. It argues only that the same conceptual rules, updated, that apply to airline-owned CRS systems should apply to all travel agencies, whether or not on-line and whether or not owned by airlines. The reason, very simply, is that there are economic incentives in the system for the presentation of biased information regardless of venue and ownership, and biased presentation reduces competition and constitutes an unfair and deceptive practice that harms consumers.

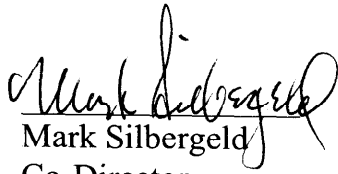
CONCLUSION

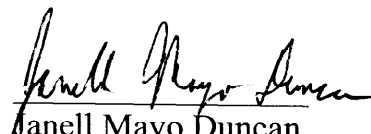
Consumers Union is concerned with the potential for the presentation of biased information by *all* sellers of airline tickets -- both on and off-line travel agents. Despite the declining ownership of CRSs by airlines, biased or inaccurate information is a major barrier to price competition in this market, because competition depends, in part, upon

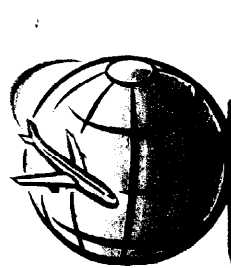
⁶ *See* footnote 4, *supra* page 5.

accurate and unbiased information regarding available air travel tickets. As discussed above, DOT has the clear authority to prohibit unfair or deceptive practices in the sale of air transportation. Consequently, we believe it imperative that DOT exercise this authority to promulgate new CRS rules that impose a non-bias requirement on *all* systems engaged in, or used for, searching and booking passenger air travel arrangements.

Respectfully submitted,


Mark Silbergeld
Co-Director
Washington Office


Janell Mayo Duncan
Legislative Counsel
Washington Office



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Travel web sites: Look around before you book

The Internet is an exciting new tool, but it's no more likely to garner you the best airfare than a low-tech telephone. The rapid growth of travel web sites has convinced many consumers that these channels provide low fares and a full array of flight options. But CRTL has concluded that travel sites don't easily, fairly, and thoroughly deliver such information.

And the need for doing so grows each day. Our most recent readership survey reveals 84 percent of CRTL subscribers have access to the Internet, and 46 percent have purchased travel over the web within the past year. As airlines—and other travel suppliers such as hotel chains, car-rental firms, and tour operators—rush to sell more products via the Internet, the number of consumers buying travel online is projected to skyrocket (see page 3).

CRTL simultaneously tested the four largest independent systems, Cheap Tickets, Expedia, Lowestfare, and Travelocity, with multiple itineraries at various times. Our mission: Find the

best flight at the lowest price.

What we were offered often surprised us. Typical results included:

► A \$232 fare Cheap Tickets listed for Newark-Los Angeles wasn't available. The cheapest available itinerary cost \$423 and required six legs, with connections both ways in Phoenix and Las Vegas.

► When we asked for a late morning flight from Newark to Fort Lauderdale, Expedia's first choices were 7:05 a.m.; 7 a.m.; 4:20 p.m.; and 6:35 a.m.

► Lowestfare's first display for Newark-Chicago connected both ways in Atlanta.

► Travelocity offered the best fare from New York to Chicago on one test, but the \$449 price was offset by flying both Pro Air and AirTran, also with an Atlanta connection.

At the same time that we queried these web sites, we had an independent consultant search for the best fares using a computer reservations system (CRS). This is a booking tool used by nearly every travel agency and regulated by the

Continued on page 6

WHO DO PEOPLE TRUST FOR LOW FARES?



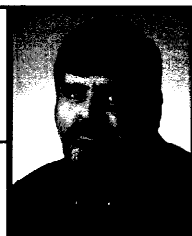
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VOLUME 16 ► NUMBER 10 ► NO ADVERTISING ► \$5
A PUBLICATION OF CONSUMERS UNION

WILLIAM J. MCGEE, EDITOR



All's not 'fare' with online bookings

As promised last month, *CRTL* has taken a close look at the largest independent travel web sites, to determine if they provide you with easy and fair access to sensible flights and low fares. What we discovered is that sometimes they do, and sometimes they don't, and figuring out when is just about impossible.

We extensively tested and compared four travel web sites side-by-side: CheapTickets, Expedia, Lowest-Fare, and Travelocity. In order to provide a yardstick for fairness and accuracy, we conducted our tests in conjunction with a computer reservations system (CRS) used by travel agents. We found that the CRS was better at providing flight selections that combined low fares and viable itineraries.

As our report makes clear, consumers should note several serious issues of concern with these web sites. In addition to the viability of the itineraries, we sometimes found problems with availability of flights. More important, there are unanswered questions concerning the bias of these systems, since advertising and marketing dollars from airlines (and other travel suppliers such as hotel chains, car-rental firms, and cruise lines) could determine the placement of their fares and rates on the screens.

For those close to the travel business, this issue invokes déjà vu: The terms "fare biasing" and "screen placement" came into use in the 1980s, when the U.S. Department of Transportation (DOT) began investigating CRSs used by travel agents. Since those systems were owned and operated by

the airlines whose inventories were being displayed, the DOT finally stepped in and created a set of rules designed to ensure that all flights and fares are presented in a fair and consistent manner. For the most part, the system works, since it is policed by rival airlines and the DOT. However, you still have no guarantee that a travel agent using an unbiased CRS has not signed incentive deals to sell one airline over another.

Our contention is that, regardless of the medium, when you book a flight you should feel comfortable that you are being given a thorough and fair listing of your choices. This is especially true on the Internet, since there is no intermediary to answer questions and make suggestions.

CRTL and Consumers Union are presenting our test findings to the DOT and asking it to consider regulating online travel sites using the same basic standards it now employs with CRSs used by travel agents. These recommendations are meant to ensure the public's right to full and honest disclosure about one of the most complex subjects in the free market: airline pricing.

William J. McGee

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Postmaster: Send address changes to *CRTL*, Box 53629, Boulder, Colo. 80328-3629.

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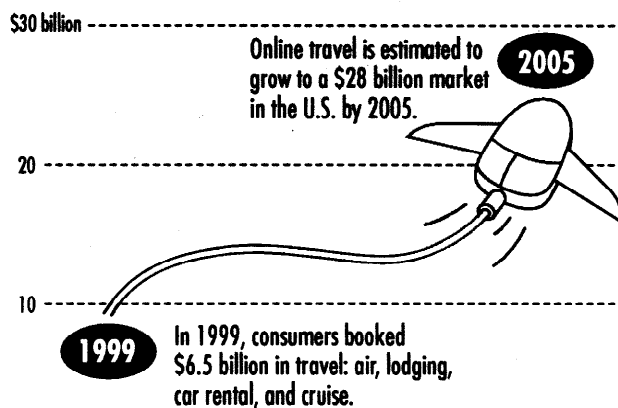
BEHIND THE HEADLINES...

Duly noted

Pass me a passport: Eleven major cities including Boston, Miami, and San Francisco now have automated numbers that let travelers make appointments for last-minute passports. Travelers will need to show proof that international travel, or a foreign visa, is required within 21 days. Visit www.travel.state.gov/agencies_list.html for a full list, or call (for a small fee): 900-225-5674 *Buon viaggio*: Rail Europe is offering bonus days for Italy-bound tourists who

have train travel in their plans. Depending on the ticket you buy and the number of days you plan to ride, you can get up to three free extra days. Call 888-382-7245 or visit raileurope.com *Concorde update*: A meeting of French and British aviation authorities was set to take place September 7 in Paris to hammer out the future of Concorde jet service. Air France's fleet of five supersonic jets has been grounded since a July 25 crash that killed 113 people, and British Airways' fleet of six was grounded soon after. ■

ONLINE TRAVEL



Source: Jupiter Communications

The battle for access continues

Several airlines, including American, Continental, Delta, and Northwest, are currently being investigated by the U.S. Department of Transportation (DOT) for possible breaches of the Air Carrier Access Act (ACAA), a federal law that protects the rights of disabled passengers. The DOT wouldn't identify the airlines that are facing less "formal" complaints.

The DOT's Office of the Inspector General also announced that it is seeking the public's input on the way airlines are accommodating air travelers with special needs.

Several airlines have already paid substantial civil penalties stemming from complaints. Two airlines—Continental and United—were found in violation of the federal regulations, while others reached consent agreements and consequently had lower penalties. Continental and United were fined \$50,000

each in March and January, respectively. Settlements were also reached with America West in September 1999 for \$1,000, and with Lufthansa and United in September 1998 for \$1,000 and \$3,000, respectively, stemming from a code-share flight. In December 1998, an agreement was also reached with Alitalia; no penalty was assessed.

Passenger complaints varied, including a failure to provide and properly stow wheelchairs, improper security procedures, and the seat reassignment of

a blind passenger with a service dog.

A spokesman for the DOT said the agency's stricter attention to ACAA violations comes from placing "more focus on enforcement and rule making in the last few years."

The number of complaints reported to the DOT by air travelers with disabilities doubled from 1993 to 1999, and increased more than 50 percent from 1998 to 1999 alone. One theory explaining the increase in the number of complaints is that better enforcement is making it easier for disabled passengers to travel by air, but as one DOT representative put it, "this provides more opportunity for airlines to do stuff to upset them."

Mark Quigley, public affairs specialist for the National Council on Disability, said the DOT had greatly improved its handling of complaints following a 1999 NCD report that detailed air-travel problems for the disabled. ■

Public invited to EPA hearings

Apetition submitted in March to the Environmental Protection Agency (EPA) by Bluewater Network on behalf of 53 citizen organizations fighting waterways pollution led to the scheduling of three public-information hearings in September on the identification and assessment of wastewater and other discharges from cruise ships. The hearings were slated for Sept. 6 in Los Angeles, Sept. 8 in Juneau, and Sept. 12 in Miami.

The petition called for an inquiry into the amount and type of waste streams coming from cruise ships, including sewage, "gray water" (from showers and laundries), hazardous wastes (dry-cleaning sludge, paint solvents) and oily bilgewater. Bluewater Network cited the 1999 criminal case against Royal Caribbean Cruises as a sign of the cruise industry's poor record in adhering to the Clean Water Act. Royal Caribbean was found guilty of rigging a secret system of pipes that allowed waste to bypass pollution-treatment equipment; it was fined \$18 million. ■

ILLUSTRATION BY JEAN WISENBAUGH

Ticket's date-of-issue is the issue

Q My fiancée and I booked a round-trip flight for May 19, 1998, from New York to Nice on Delta, at a discounted rate using a companion-ticket offer. We had to cancel the trip in March 1998 and were told we could use the ticket for future travel on Delta for a period of two years. In April 2000 we booked another trip to Europe, but when I tried to use the tickets, I was told they had expired. I thought we had until May 2000. I wrote to Delta, but the airline refused to re-issue or refund the tickets. Do I have any recourse?

—William Petas
Ridgewood, N.J.

A Delta will reissue unused tickets within one year for international travel, and within two years for domestic travel for a fee of \$150 or \$75, respectively. The agents who told Petas the tickets were valid for two years were wrong, since those tickets were for an international itinerary. These rules apply only to paid tickets: Most companion tickets are not valid for future travel; they expire if not used on the specified travel dates because they hold no monetary value. It's not a big loss in this case, since Petas paid just \$22 in taxes for his companion ticket.

The date of issue is the crucial marker: Tickets expire one or two years from the

date of issue—not from the booking date, the cancellation date, or the intended travel date. Travelers should always question airlines carefully about parameters and options on ticket refunds and vouchers and make sure they understand how the timeline will be calculated.

Since Delta representatives gave Petas incorrect information about how long the ticket would remain valid, the airline agreed to give him \$430 in vouchers for future travel. That's the amount of the original paid ticket, less taxes and the \$150 change fee. The expiration period on the vouchers? One year from the date of issue. ■

Ramada room rate quadruples on arrival

Q I booked two rooms for two nights at the Ramada Limited & Suites Augusta in Georgia six months in advance, at \$53 per night. The rate was confirmed again a month before my stay. We were told upon arrival that the rate was actually \$225 per night. The city was sold out because of the Masters golf tournament, so we had no choice but to pay. Why wouldn't Ramada honor my confirmed rate?

—Randy Proffitt
Mobile, Ala.

A The rate Proffitt was given was a mistake. The Augusta location is a franchise operation that was still under construction when Proffitt's travel agent booked his stay. The hotel itself was not accepting reservations at that time because it didn't yet have the required certificate of occupancy, but Ramada's central reservations office was booking rooms unbeknownst to the hotel owner.

The \$53 rate Proffitt was quoted compounded the error, since the hotel's regular

rate during the Masters tournament—when most rooms around the city fill up—is \$225 per night. After the hotel's management learned of the booking confusion, it sent letters to guests with reservations explaining the rate change. But it appears that a number of guests weren't contacted, including Proffitt.

Proffitt wasn't the only traveler caught in the confusion, but at least he got a room. Others weren't so lucky: The hotel was overbooked during the tournament and had to turn away a number of guests, who were placed at nearby hotels. The hotel picked up the tab for any cost differences.

Proffitt disputed the charge on his American Express account, but AmEx denied his claim. The hotel owner said he was not entitled to a refund because he stayed at the hotel and signed the charge slip agreeing to the increased amount. "He didn't have to stay here," the owner told *CRTL*. "He was welcome to leave. I don't have to give him anything."

But Ramada's guest-services department didn't agree. The quoted rate was a mistake, but that shouldn't be Proffitt's problem. After *CRTL* contacted Ramada, it sent Proffitt a check for \$777, which

THE HOTEL SENT LETTERS TO GUESTS ABOUT THE RATE CHANGE, BUT PROFFITT GOT LEFT OUT.

the hotel chain may bill to the franchise. Ramada has acted as an intermediary for a number of these complaints, and has billed that hotel property as much as \$21,000 so far. ■

Consumer Power

You're invited to submit questions and problems based on your own experience. All should be of general interest. We cannot acknowledge all inquiries, answer all questions, or return submissions. Mail material to *CRTL*, 101 Truman Avenue, Yonkers, N.Y. 10703-1057, e-mail to power@travel.consumer.org, or fax to 914-378-2919. Please include a daytime phone number.

hotspots

YOU CAN'T AFFORD TO MISS

Bask in Indian summer

Some of the country's most popular summer haunts are even more pleasant in early fall. By October, crowds have thinned, prices often drop, and cooler weather is more conducive to shopping, sports, and other activities. What doesn't diminish is the basic appeal of such locales around the country. We've chosen the following for their comfortable temperatures, picture-postcard scenery, and special attractions; in most cases, the hotel rates we give are lower than those in summer.

ARKANSAS • The Ozarks

Though blistering in the summer months, this diverse part of Arkansas, full of lakes, rivers, and valleys, cools off to an average high of 77° in October. Outdoor activities in serene settings abound, including fishing, boating, and hiking. The Ozark Folk Center is frequently the site of local heritage, music, craft, and dance events. The 1886 Crescent Hotel & Spa in Eureka Springs—a landmark property that just underwent a multimillion-dollar renovation—offers carriage rides, a swimming pool, and shuffleboard. Its October rates range from \$99 to \$225. Contact: 800-628-8725, www.arkansas.com.

CALIFORNIA • Carmel-by-the-Sea

Still balmy in October (with average highs in the 70s), Carmel-by-the-Sea becomes a fall playground for visitors craving such outdoor pursuits as bicycling, kayaking, and golfing. It's also a mecca for antique and art buffs, offering more than 70 studios, galleries, and shops for browsers. La Playa Hotel overlooks lush gardens and charges \$139–\$325 for rooms in the main building, \$265–\$575 for cottages. Contact: 800-550-4333, carmel@mbay.net.

MAINE • Bar Harbor

Surrounded by Acadia National Park on three sides and the Atlantic Ocean on the fourth, historic Bar Harbor is an ideal spot for trekkers and nature lovers, who

often head to the park's 41,000-acre wildlife sanctuary. Golfers can spend the day at one of the oldest 18-hole courses in the United States—the Kebo Valley Golf Club. Bar Harbor's northerly location means an early onset of autumn colors as well. Atlantic Oakes, a 12-acre oceanfront resort with a mansion and seven other buildings, reduces its summer rates of \$132–\$172 down to \$62–\$92 in mid-October. Contact: 800-288-5103, www.barharborinfo.com.

MASSACHUSETTS • Cape Cod

Clogged with tourists from May through September, Cape Cod's roads, hiking trails, and shoreline offer a more leisurely experience in fall. You can stroll the 27,000-acre Cape Cod National Seashore or pedal your way along the 25-mile Cape Cod Rail Trail from Dennis to Wellfleet. Chatham is the place to go for majestic old lighthouses. The centrally located Cape Point Hotel in West Yarmouth offers rates of \$44–\$139, a saving off the summer rates of \$54–\$199. Contact: 800-227-6277, www.massvacation.com.

MICHIGAN • Mackinac Island

Mackinac (pronounced "Mackinaw") Island offers a cool, leisurely getaway amid intensely blue waters, Victorian architecture, and horse-drawn carriages. (Motor vehicles are banned on the island.) Outdoor pursuits in October include trips to Mackinac State Park and up-close views of limestone formations with such names as "Devil's Kitchen" and "Skull Cave." You can also go horseback riding or bicycling, or take in one of October's special events, including a Big Band Extravaganza at Grand Hotel; rates there average \$400 for a double room. Contact: 800-4-LILACS (454-5227), www.mackinac.com.

NEW JERSEY • Ocean City

Stroll eight miles of Atlantic shoreline in this resort town located just 20 minutes



Fall's colors and coolness bring out the visitors.

from Atlantic City and two hours from New York City. Lower temperatures and lower humidity in October bring visitors out for golf, tennis, volleyball, and shuffleboard. The Scarborough Inn, a restored Queen Anne-style hotel in the historic district, features a library, wrap-around porches, and reduced autumn rates of \$95–\$160. Contact: 800-232-2465, www.oceancityvacation.com.

OREGON • Columbia River Gorge

Camping and hiking amid this National Scenic Area's dramatic waterfalls—the trails are said to be not strenuous—are two of the major attractions here. Another is a drive along the Historic Columbia River Highway. Just west of the falls is the historic Vista House at Crown Point State Park, which provides a memorable panoramic view of the gorge's geological formations. Those hungering for more activity will find horseback riding and fishing, cannery tours, or the chance to pick apples at a local orchard. Room prices at the 1904 Columbia Gorge Hotel, perched above the Columbia River, range from \$159 to \$279 year-round. Contact: 800-984-6743, www.travelportland.com.

WASHINGTON • Ocean Shores

Crisp autumn air brings visitors to this northwestern haven for such area events as the "Whale of a Quilt Show." The town is also known as a playground for world-class kite flying. A popular inn, Linde's Landing, features fireplaces in some rooms and a sauna. Starting in October the hotel offers deep discounts from its summer range of \$75 to \$209. (Call the hotel for rates for specific dates.) Contact: 800-762-3224, www.oceanshores.org. ■

U.S. Department of Transportation (DOT) to prevent airlines from unfairly biasing such systems. In general, we found that the CRS provided lower fares and better routes than the first flights recommended by the web sites. Note, however, that a CRS is only as good as the travel agent who uses it: If the agent receives incentives for booking a particular airline, then his or her recommendations may not reflect the unbiased listings.

Our research came to no firm conclusion on whether travel web sites are biased because of deals with airlines. But we did note some disturbing evidence (see page 8).

In addition, we found problems in four key areas; each web site is affected by at least two of them:

- 1) Lack of sensible itineraries;
- 2) Reordering of flight information;
- 3) Difficult-to-navigate features;
- 4) Unavailability of flight listings.

Our research suggests that these web sites work best as tools for searching out low fares and viable options. For best results, book through the web only after consulting with other sites; the airlines themselves (many offer exclusive deals on their own branded sites); or a travel agency that discloses any potential biases of its own. That said, Expedia and Travelocity offer better information than their two competitors.

How we tested

To evaluate the four web sites, we selected six of the busiest and most competitive routes in the nation, based on DOT statis-

THE BIGGEST TRAVEL WEB SITES

June 2000

Domain	Unique Audience
travelocity.com	4,640,993
expedia.com	4,345,868
lowestfare.com	944,585
cheaptickets.com	911,919

SOURCE: Nielsen NetRatings

tics for passenger traffic and market share domination. The routes, all of which offer low-fare competition, are: Los Angeles–New York; Chicago–New York; New York–Orlando; Fort Lauderdale–New York; Chicago–Denver; and Chicago–Las Vegas. With multiple airports in New York and Chicago, these six routes encompassed 19 separate itineraries. We tested a complex schedule of itineraries that included typical vacations with a few business trips thrown in. This let us evaluate the fares we got when we gave the web sites advance notice varying from 24 hours, to one week, two weeks, and four months.

Our benchmark for comparing the sites was Apollo Galileo, one of the major CRSs regulated by the DOT, and operated for us by an independent consultant, New York-based Harrell Associates Inc. In an attempt to conduct apples-to-apples testing, we used the “lowest fare” function where available on each web site, as well as on the CRS. We conducted nine tests in all, at various times of the day and week.

The analysis in the chart below is based on the first offering for each route. When the DOT devised fairness rules for CRS displays, the Department determined that

the ordering was crucial because travel agents do not always have the time to scroll through multiple screens. We think this criterion is certainly just as important for consumers surfing the web, especially since many consumers may assume that the first listing is the best.

The results are discussed at length, and summarized in the chart below.

Low fares and wacky flights

In most cases, each web site provided us with an attractive ticket price as a first choice (most systems rank flights by fares, from lowest to highest). However, these low fares sometimes entailed wildly impractical itineraries.

In fact, this was one of the most disturbing results of our testing. At first glance, it seemed the four travel web sites, both individually and collectively, had beaten the Apollo Galileo benchmark with lower fares on many routes. But a closer look quickly determined that the first offerings often produced a low fare but did not fulfill our requirements for departure times, or involved convoluted connections and “interlining” on two or more airlines.

For example, when we asked Cheap Tickets for a low fare between New York and Chicago—the third-busiest route in the nation—we were first offered a US Airways trip totaling eight legs. It included stops in Syracuse, N.Y.; Buffalo, N.Y.; and Philadelphia in each direction, with a total flight time on the outbound journey of 11 hours, 29 minutes (of course, that’s if all flights operated on time).

web analysis

Here’s how the sites compared, when we looked at the first flight listed and assessed the viability of that itinerary. Only Expedia combined low fares and viable flights more than half the time. The results are compared with Apollo Galileo, a regulated computer reservations system (CRS). On each route, we selected the lowest fare from multiple itineraries.

WEB SITES	NUMBER OF TRIP REQUESTS ¹	NUMBER OF FARES LISTED FIRST THAT WERE VIABLE	PERCENT OF FARES LISTED FIRST THAT WERE VIABLE	NUMBER OF VIABLE FARES LISTED FIRST LOWER THAN OR EQUAL TO CRS	PERCENT OF FIRST-LISTED FARES THAT WERE VIABLE AND LOWER THAN OR EQUAL TO CRS
Expedia ²	49	27	55 %	22	45 %
Travelocity	52	22	42	21	41
Cheap Tickets	21 ³	6	29	6	29
Lowestfare	54	13	24	13	24

¹ Based on test sessions that provided conclusive results for each route. ² Expedia departures processed by time of day, not specific hours. ³ Cheap Tickets unable to process 20 trips due to mailing restrictions.

SOURCE: CRTL

We also logged onto Lowestfare and requested a 5 p.m. departure on Aug. 21 from Los Angeles to New York, the busiest route in the U.S. The first offering was an America West departure at 6:59 a.m. on Aug. 22, 14 hours later.

So what's a "viable" itinerary? "That's very personal to each traveler," says Craig Cartwright, director of global product marketing for Apollo Galileo. He notes that travelers usually look for two key things: the lowest price, and a nonstop flight.

While the DOT rules about CRS displays are very specific about fairness, they don't address viability. However, Apollo and other CRSs do follow programmed logic that has much the same result: They search first for the most appropriate nonstop flights, then for connecting flights on the same airline, and last for interline connections on two or more airlines.

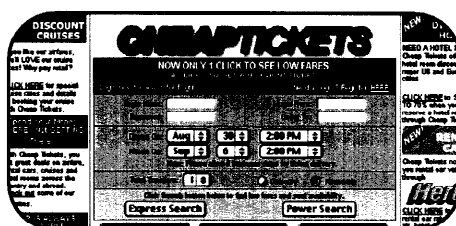
CRTL created its own standard of viability by examining the findings generated by Apollo Galileo during our testing. With six routes, 19 itineraries, and nine tests, we found that Apollo Galileo provided low-fare flights and met the following criteria of a viable flight itinerary in every case but one:

- ▶ A single airline itinerary.
- ▶ A departure time of no more than one hour prior to that requested.
- ▶ A departure time of no more than four hours later than that requested.
- ▶ No more than one connecting flight.
- ▶ A connecting time of no more than three hours.
- ▶ A connecting airport no more than 700 miles from a straight-line route between origin and destination.

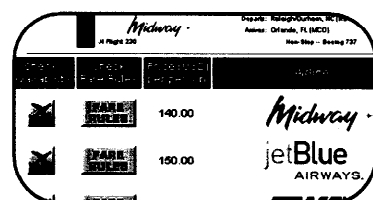
When we applied these viability standards to the first offerings on each route from the four web sites, most itineraries did not pass muster, as the chart at left makes clear. Only Expedia produced a viable first choice for even half of our requested trips. And in many cases, after nonsensical routings were thrown out, the web sites' most logical choices matched Apollo Galileo's first listings.

don't pack yet...

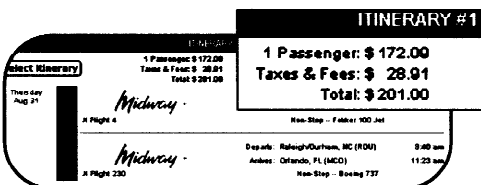
A low fare isn't worth much if you can't buy it, as we saw repeatedly with Cheap Tickets' Power Search. Here, the lowest fare listed from New York to Orlando was Midway Airlines at \$140, yet when we checked availability, the lowest fare available for booking was actually \$201.



Screen 1: A request for flight information.



Screen 2: An attractive fare is posted.



Screen 3: The next available flight costs \$61 more.

David Lovely, Lowestfare's director of marketing, says, "It's amazing how many people will take a horrendous connection to save \$25 or \$30." Clearly there are those willing to spend hours online patching together itineraries, and even more hours connecting in multiple airports. But we believe that many routings on these sites just didn't make sense for most travelers.

Even when flights listed first were viable, they were not necessarily the unusually low fares you might expect. Overall, those viable flights were often no cheaper than fares we got from the Apollo Galileo benchmark for the same route. We found these first-listed, viable flights were almost split between those that were cheaper than the CRS and those that matched it.

We did notice some patterns, however. One is that the web sites produced better results for flights requested weeks or even months in advance. For example, each of

the four online systems provided equal or better fares than Apollo Galileo, on average, for a flight between Chicago and Las Vegas departing four months from the date we booked. The web sites also produced better fares when we were less stringent about our departure times.

CONCLUSION: In comparing first-choice listings, Expedia and Travelocity offered the greatest number of viable itineraries, at 55 percent and 42 percent, respectively. Expedia and Travelocity also provided the most viable first-choice itineraries with fares equal to or lower than those we found on the Apollo Galileo benchmark, at 45 percent and 41 percent respectively.

Do they list flights fairly?

Bias is a concern not only because travel web sites may not be disclosing all flight and pricing information fairly, but also because the methodology of the listings can be quite confusing. Placement is key, and should be consistent from airline to airline. In other words, if an airline offers a two-stop connection, such a flight should be listed below a one-stop connection.

Terrell Jones, president and CEO of Travelocity, gave testimony before a Senate committee in July, and said: "Travelocity does not reorder the information we receive from Sabre [a CRS and Travelocity's parent company]. Thus the schedule, price, and availability displays you see in Travelocity comply with DOT's rules." As for Expedia, it can display flights several ways, such as by fare, by airline, or by time of departure.

One key concern is that the low-fare, viable flights selected by Apollo Galileo in our tests were not offered at all by some web sites, regardless of ordering. On one test, the CRS told us the best choice between New York and Fort Lauderdale was a Spirit Airlines flight for \$289. Expedia listed 11 itineraries with flights flown by Delta, Midway, American, and TWA, but didn't list Spirit at all.

CONCLUSION: It is our judgment that none of the four web sites consistently

featurereport

offered complete and fair listings of all viable flights in our tests, particularly when we compared their results with the Apollo Galileo benchmark.

How easy are they to use?

Travelocity offers you the clearest choices in searching for a flight. There are four fare-search options, and each is accompanied by an easy-to-understand header: (1) My travel dates are flexible; (2) My travel dates are not flexible but my travel times are; (3) I need to travel on specific dates and times; (4) I want to name my own price with Priceline.com. Travelocity also offers the most sophisticated pricing mechanism, which allows you to tailor searches for business or first class, and for restricted and nonrestricted tickets in economy. You can specify airlines, as well as the acceptable number of connections.

Expedia also offers an extensive list of search options, though it is not as clearly displayed as Travelocity's. Express Search can be modified to include specific pricing tools, such as "avoid most change penalties" and "no advance-purchase restrictions." Another valuable feature is the ability to request flights not only by specific hours,

but by general times of day. Expedia also offers Price Matcher, which—like Price line.com—allows you to bid for seats.

Lowestfare's search function is not as sophisticated. It features Fare Finder, which searches for airline prices based on routing and dates, and the more specific Plan Trip function, which allows for flight times and a few more fares. But it's still rather limited.

Cheap Tickets offers two search tools, neither of which allows you to tailor flights and fares. This web site has a more serious drawback, however: It can't process tickets less than five business days in advance, making Cheap Tickets virtually useless for many business trips, last-minute week-end getaways, or family emergencies.

Cheap Tickets and Lowestfare also had problems sorting itineraries by airport, even after we specifically asked for one airport. Lowestfare's Lovely says, "New York and other cities with more than one major airport have been a problem for us."

CONCLUSION: Travelocity offers more detailed and user-friendly booking tools than the other sites. Expedia ranked a close second.

Continued on page 12

IS YOUR WEB SITE BIASED?

It's obvious that a web site titled "United Airlines" will offer flight options and booking tools inherently designed to favor United Airlines. Independent travel web sites such as the four we tested would appear to offer an objective alternative.

Our testing of these sites did not yield conclusive findings, but they did reveal some telling evidence that travel sites may not be totally objective at all times:

- On Travelocity, advertised airlines dominated flight listings.
- On Lowestfare, many TWA flights with inconvenient itineraries (obtained through a contract fare deal) were repeatedly listed first.
- On all four sites, certain airlines with viable itineraries for routes we tested were not listed at all.

The concern about bias dates back to the 1980s, when the U.S. Department of Transportation (DOT) devised rules for computer reservations systems (CRSs), after receiving complaints about biased displays from travel agencies and airlines. The DOT was clear about regulating only airline-owned CRSs, so that such systems couldn't unfairly aid their sister-company airlines.

None of the travel web sites we tested is owned by any airline, though all four accept advertising. And in some cases airlines pay for more prominent placement.

Featured airlines

Travelocity presents "featured airlines," which receive full-color advertisements linked to specific cities or airports (see right). When you request a list of fares, Travelocity then asks if you would like flights offered by the featured airline, or choices from other airlines too.

In CRTL's testing, the featured airline on Travelocity was listed first 48 percent of the time and dominated other listings. In nine separate tests, each recording the top nine flight choices, the featured airline flew at least one leg of every trip Travelocity posted. Many of these trips involved convoluted itineraries melded together with at least one other airline.

Lowestfare's contract agreement with

CRTL sample

advance warning

The travel sites had more difficulty processing trips on short notice. For example, on Aug. 4, we requested a flight between New York/LaGuardia and Chicago/O'Hare, departing at 9 a.m. on Aug. 7, and returning at 6 p.m. on Aug. 8.

WEB SITE	RESULTS	KEY CONCERNS
Cheap Tickets www.cheaptickets.com	Unable to process requests for flights departing in less than five business days	Not applicable
Expedia www.expedia.com	\$799 Northwest (departure connection in Minneapolis; return connection in Detroit)	<ul style="list-style-type: none"> ► Departure time of 6:30am (2.5 hours earlier) ► Return time of 6am (12 hours earlier)
Lowestfare www.lowestfare.com	\$1,191 America West (connection in Columbus, Ohio)	<ul style="list-style-type: none"> ► Return time of 7:44am/Aug. 9 (almost 14 hours later)
Travelocity www.travelocity.com	\$785 Delta/Northwest (departure connection in Atlanta; return connection in Detroit)	<ul style="list-style-type: none"> ► Interline change of airlines ► Unreasonable connection in Atlanta
Apollo Galileo	\$637 Northwest (connection in Detroit)	None

1. Travel agency computer reservations system.

SOURCE: CRTL

TWA seems to have influenced its flight listings: In our tests, that airline was listed as the first choice 50 percent of the time (in 27 of 54 tests), when no other site listed TWA first more than 23 percent of the time. The TWA routings sometimes involved connecting flights when other web sites offered nonstops.

Missing airlines

Another concern is that cross-referencing our test results revealed that certain airlines listed in our Apollo Galileo benchmark as offering the lowest fare and a viable itinerary were not listed on some web sites at all. Spirit Airlines was missing from Expedia; Vanguard was absent from Expedia and Lowestfare; and Southwest appeared only in Travelocity, even though Cheap Tickets and Lowestfare receive data from Sabre, which includes Southwest.

One key airline executive says web site marketing initiatives include preferential listing of flights. Without identifying specific sites, Al Lenza, vice president of distribution planning for Northwest, is blunt: "The effect is, you will get some low fares, but not all low fares.... They want to charge us overrides [bonus commissions]. They claim they can give us more business. That means some of it is biased."

He adds, "[Airlines] are getting more than just banner ads for their money. When there's a tie [in airfares], they show up first. And they get 'preferred carrier' status. Advertising is OK, but it shouldn't influence the flight selections.... We're just not going to have our inventory be used to mislead the customer."

Multiple partnerships

Lenza does have interests of his own, however: Northwest owns a stake in Orbitz, a joint web site funded by the nation's five largest airlines and slated to launch by June 2001. Both the DOT and a Senate committee have raised concerns about Orbitz. The site's owners say it will be completely unbiased, despite reported requests for member airlines to provide exclusive fares in return for inclusion in the system.

The independent sites and the airline sites such as Orbitz are accusing each other

of bias. Terrell Jones, Travelocity's president and CEO, told the Senate: "Further investigation into this joint supplier sales and marketing site [Orbitz] is warranted."

Orbitz has in turn attacked independent travel web sites. Alex Zoghlin, the site's chief technology officer, said recently of travel web sites: "They tell [airlines] they will move market share. That's a euphemism to bias screens."

But others, in the travel industry, have concerns about bias in web sites. So the DOT has asked for public comments on whether it should regulate web sites (airline-owned or not) as it regulates CRSs.

To regulate or not?

The two leading travel web providers disagree about DOT regulation. Jim Marsicano, Travelocity's executive vice president of sales and services, says, "It wouldn't bother us at all to have the same rules applied to the Internet."

But Richard Barton, president and CEO of Expedia, says, "Absolutely not. The inspiration for [regulating CRSs] was that the airlines owned the CRSs. We run a retail business. Should a government body decide where Wal-Mart should place Chee-tos on the shelf?" He adds that he doesn't believe in "regulation of fast-moving complex environments."

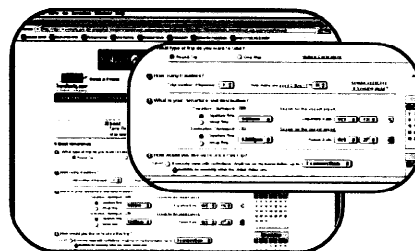
Barton contends the bias issue is moot for sites such as Expedia, because their "motives are different" from those of airline-owned CRSs, and "anything... not in the best interests of our customers—competition is a click away." He adds: "The terms 'screens' and 'biasing' don't apply anymore. That's old technology."

He acknowledges that Expedia accepts airline ads to promote discounted fares, but says it doesn't change the ordering of fares. Does Expedia promise increased market share? "That's not the discussion we have with them."

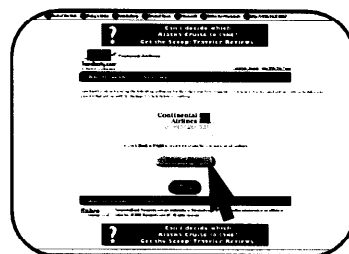
CRTL and Consumers Union will be presenting our test results to the DOT in response to its request. Clearly there is reason to question the display methods on online travel booking sites. The technology may be new, but the concerns being raised about fairness and accuracy aren't, and they're just as valid as ever.

Blurring the lines?

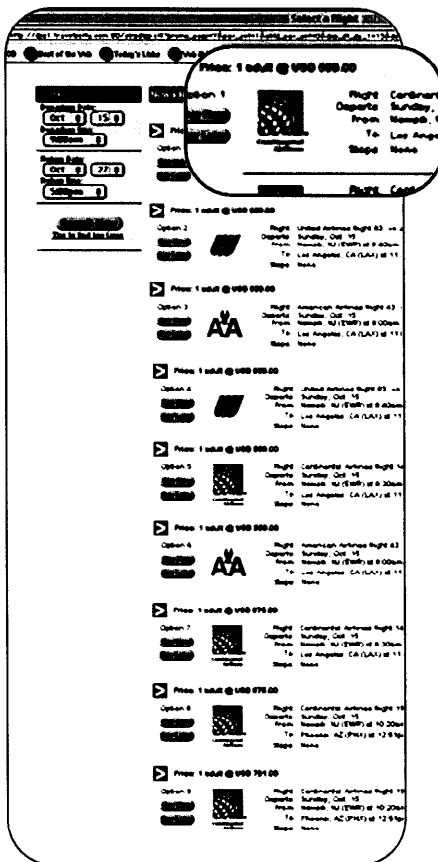
Some may find it difficult to distinguish between flight listings and paid advertisements for airlines on Travelocity.



Screen 1: A request is made for a flight from Newark to Los Angeles.



Screen 2: An ad for Continental, the "featured airline," appears above "all airlines."



Screen 3: We select "all airlines," and Continental is 5 of 9 choices. The first flight (Continental) leaves 30 mins. earlier than we asked, yet the second (United) leaves only 20 mins. earlier.

How well do hotels ensure safety?

You're staying in a pristine-looking hotel with a well-known name and a long list of amenities. You have every reason to feel secure at this property, right? It depends. *CRTL* reviewed the security practices of seven major hotel chains to see what technologies and services were in place to protect you and your belongings.

While there are no concrete statistics on hotel safety and security (it's a touchy subject for many companies and it's hard to track), the fact that hotels are employing new types of security measures—installing video cameras and employing 24-hour surveillance, adding in-room safes, replacing keys with electronic cards, and controlling access to the property—shows that the lodging industry is making an attempt to respond to guests' concerns.

"Safety is the number-one attribute sought by travelers in lodging accommodations," says Peter Yesawich, president of Yesawich, Pepperdine & Brown (YP&B). Overall, 85 percent of travelers who responded to the YP&B/Yankelovich Partners National Leisure Travel Monitor said that the safety of the hotel or motel is considered "extremely or very desirable."

Another study, conducted by D.K. Shifflet & Associates, shows that travelers who spend an average of 1 to 34 nights at a hotel per year give the lodging industry a score of 8 out of 10 when polled on their "Safe Feeling from Harm." That's not a particularly bad score, but it's not good enough, according to many travel agents, travelers, and industry analysts. "This illustrates that people do not feel as safe as they would like when staying at a hotel," says Shifflet analyst Mike Anderson.

What to expect from your hotel

While safety and security requirements vary slightly from state to state, all hotels must comply with local city building codes regarding fire safety (e.g., fire escapes, smoke detectors, sprinklers, back-up lighting and power systems) and personal security (door locks) in order to receive and maintain their occupancy permits. Most go the extra step with electronic room keys.

In the course of our survey, we found that the major chains meet the basic requirements for safety, and that individual properties have the option to employ additional security methods. These can include video surveillance cameras and 24-hour uniformed patrol. Many also have staff trained to administer basic

first aid. As for your belongings, in-room deposit boxes and safes are present in many chains. Our findings are summarized in the chart on pages 12–13.

Wyndham is one chain that does employ company-wide procedures—such as a delivery alert via telephone when room service is on its way—and Preferred Hotels & Resorts Worldwide won't even consider admitting a property to its luxury network unless it adheres to a comprehensive Preferred Standards of Excellence program. Standard requirements at all Preferred Hotels (which are monitored by unannounced third-party audits) include

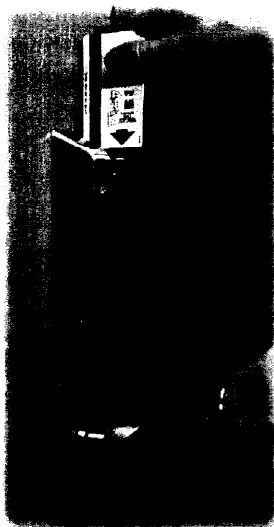
electronic key locks, in-room safes, 24-hour security staff, controlled access to the building and guest-room floors, automated fire-control systems, information videos and/or printed safety information in the room, emergency power and lighting, and peepholes in all guest-room doors. (Video monitoring is recommended by Preferred Hotels, but not required.)

Four Seasons also employs company-wide policies, ranging from the use of magnetized cards for room access to 24-hour patrols.

"Our utmost concern is the safety and security of our guests," says Ron Murphy, director of security for the upscale Four Seasons Los Angeles. "Thus, we do whatever we can to alleviate concerns, especially among skittish guests and females traveling alone. One thing we have done that has definitely lowered hotel thefts is to make keys obsolete. We use the Ving Card system and it enables us to track the last 250 entries into any guest room." (Not every Four Seasons property uses Ving Cards. Others, like Pan Pacific hotels, use cards with coded holes that get recoded when guests check out.) Each electronic card used for opening the doors is magnetized and its use can be traced via a computerized card reader that gets plugged into the door; tracking information is then read by the computer and printed out.

"We can tell who's been in the room, be it room service, the guest, a housekeeper, a maid, or maintenance," says Murphy. "Since installing the system two years ago, there has been a huge decrease of alleged stolen items."

But while theft may be on the decline, intrusion by uninvited persons still tops the list of concerns of frequent travelers. The best—and only—way to prevent this from happening is to use the dead bolt and/or chain, says Elana Frankel, a frequent traveler. Frankel learned this lesson when she awoke in a Washington, D.C., hotel to find a man had walked right into her room. "He had a key and was probably an employee looking for a bed to use," says Frankel. "When I sat up in bed, he said 'whoops' and walked out, but it was still pretty scary."



Electronic key cards are the best solution.

Bill Strubbe, another frequent traveler, looks for hotels that limit access to outside guests. "I've often entered a hotel to visit a friend or just wander around and check it out, and I have never been stopped by anyone from entering a lobby or an elevator or walking down a hallway," says Strubbe. "They can say what they want, and do all the 'right' things, but it still makes you kind of wonder just how good the hotel security really is."

What the traveler can do

"I think that hotels are doing all of the right things with regard to equipping their properties with the proper hardware to protect their guests," says Bill Irwin, vice president of security services for International SOS, the world's largest global emergency assistance program for travelers. But he adds, "It is up to individual travelers to use the safes, dead-bolt their doors, lock the windows, and educate themselves on safety procedures as well as their environment in order to avoid problems."

Irwin adds that it is also up to the traveler to rely on local contacts (he suggests calling a travel agent in your planned destination) for recommendations on a hotel in a "safe" neighborhood. "It's not enough to choose a hotel by name, as often there are some very nice hotels in shady neighborhoods," says Irwin. "Better to stay somewhere small in a nice area of town. Also, choose a property that caters to business travelers, rather than vacationers and tour groups as the latter two are more likely to be targets for criminals."

Irwin recommends that travelers (or their travel agents) do some pre-trip homework.

"Don't be afraid to call the hotel and ask whether they have on-duty security officers, closed-circuit TV monitoring the parking lot and entrances, in-room safes, electronic keys, and dead bolts," says Irwin.

When it comes to protecting valuables, there is no excuse for not using the hotel safe, he adds, as guests have little legal recourse in the event of petty theft, which typically happens when guests leave valuables in plain sight. Guests should not ex-

pect much in the event a theft does occur, as hotels' liability for stolen property is determined from state to state by "inn-keeper laws." The amount varies from as little as \$250 in California to \$1,000 in Georgia.

Ada Brown, owner of Seaside Travel in Long Beach, Calif., learned the importance of taking added precautions the hard way. Brown—who was staying alone in a ground-floor beachfront room—was awakened at 3 a.m. by the sound of persistent knocking at her door. She quickly called hotel security to report the event and was told that someone would be right up. Before anyone appeared, she heard someone trying to open her patio door and panicked because she wasn't sure if she'd locked that door. While she was on the phone pleading with the front desk to send someone immediately, a man in uniform appeared at her door and identified himself as a security guard.

While Brown never heard from the "visitors" again, it raised enough questions about the hotel's security and her own safety to result in her changing her habits on the road.

Brown often recounts her story to clients and advises them to learn from her experience. "Never stay in a ground-floor room, especially if it has a door opening to the outside, and request a room near the elevator so you don't have a long walk to your room," says Brown. "And it doesn't hurt to put a chair back under the doorknob."

Summing up

While all of the major hotel chains are taking steps to improve the safety and security of their guests, practices vary by hotel property.

Before booking a room, travelers would do well to call the actual site and inquire about its security and safety policies. It's also important to remember that no system is foolproof. In order to ensure their own safety, travelers need to take steps to protect themselves from potential harm. See the sidebar at right, "How to Protect Yourself," which lists tips for the safety-minded traveler. ■

HOW TO PROTECT YOURSELF

- Stay at hotels that have electronic keys, dead bolts, door peepholes, and 24-hour security.
- Lock all windows and doors, especially if you are alone.
- When booking your room, request a room closer to the elevator than the stairs.
- If your room number is announced by the front-desk clerk at check-in when others could hear it, consider asking for a different room.
- Request a room that is not on the ground floor; these are the easiest targets for intruders.
- Lock your valuables in the in-room safe or store them in a safe-deposit box at the front desk.
- If you are going to be arriving late at night alone by car, call the hotel ahead and ask to be met in the parking lot by a staff member.
- Do not open the door until a visitor or room-service person has identified him/herself.
- Have a valet handle your car. Avoid dark parking lots and garages by leaving your car in the hotel's hands.
- Travel with a small flashlight, rubber door stop, and personal alarm.
- Keep your key out and ready for use so you don't have to fumble for it upon arriving at your room.
- Ask room service to call you right before they come up so you will know who's there when they knock.
- Upon checking into your room, familiarize yourself with the location of the fire escapes and plan your route in the event of emergency.
- Keep your identity private. If you are a woman traveling alone, use only your first initial and last name when booking and checking in.
- Before leaving your hotel room for any period of time, leave the lights and TV on to give a potential intruder the impression that your room is occupied.

away from home

How safe is your hotel? CRTL surveyed seven major hotel chains to room, it's wise to call the property where you're planning on staying and

	BEST WESTERN	CENDANT	HYATT
SECURITY			
Electronic room key	Yes	At most properties	Yes
Safety chain/dead bolt	Yes	Yes	Yes
Video surveillance			
In public areas	Varies by location	Property's discretion	At most properties
At entrances	Varies by location	Property's discretion	At some properties
Security personnel			
On-site	Varies by location	Property's discretion	Yes
Uniformed	Varies by location	Property's discretion	Yes
24-hour	Varies by location	Property's discretion	At some properties
In-room safe	Varies by location	Property's discretion	At most properties
Safe-deposit box at front desk	Varies by location	At most properties	Yes
Guest room accessible by interior corridor	Varies by location	Varies by property design	At most properties
Restricted access to guest-room floors	Varies by location	Property's discretion	Varies by location
FIRST AID			
Staff trained in CPR	Varies by location	Property's discretion	Yes
Staff trained in first aid	Varies by location	Property's discretion	Yes
FIRE			
Smoke detectors			
In guest rooms	Per local code	Per local code	Per local code
In public areas	Per local code	Per local code	Per local code
Multiple exits for each floor	Varies by location	Per local code	Per local code
Ventilated stairways	Per local code	Per local code	Per local code
Automatic fire doors	Varies by location	Per local code	Per local code
Auto link to fire station	Varies by location	Per local code	To central reporting
Auto-recall elevator	Varies by location	Per local code	Per local code
Sprinklers			
guest rooms	Per local code	Per local code	Per local code
public areas	Per local code	Per local code	Per local code
Emergency lighting	Per local code	Per local code	Per local code

SOURCE: CRTL

Travel web sites: Look around before you book

Continued from page 8

Is this low fare available?

We used these four web sites to search out fares and confirm availability, but we did not book flights. However, you should know that not all listed flights on these sites are always ready for purchase. Expedia, Lowestfare, and Travelocity list fares for booking only. Lowestfare's Lovely says

fewer than one percent of customers take too long to book and confirm a posted flight, but says Lowestfare receives "surprisingly few" complaints about it. We had a few minor problems with Travelocity and none with Expedia.

Cheap Tickets offers you two choices: Express Search and Power Search. While

Express Search lists available flights only, Power Search lists "the best fares, whether they are available or not." We found that usually they were not.

CONCLUSION: Here the edge goes to Expedia, with Travelocity and Lowestfare close behind. With a few exceptions, we found that flights listed in these three systems were available for booking.

How do they get the airline seats?

The web sites obtain their inventory in two key ways, one of which is the same

see what kinds of safety and security practices they had in place. Note: In most cases, practices varied by individual properties. Before booking a hotel ask what that site's policies are regarding security, first aid, and fire safety.

MARRIOTT	RADISSON	STARWOOD	WYNDHAM
Yes	Yes	Yes	Yes
Yes	Yes	Yes	Yes
At most properties	Determined by property	Determined by property size/location	At most properties
Varies by property	Determined by property	Determined by property size/location	At most properties
Varies by property	Determined by property	Determined by property size/location	Varies by property
No	Determined by property	Varies by property	Varies by property
Varies by property	Determined by property	Varies by property	Varies by property
Varies by property	Determined by property	At most properties	At some properties
Yes	Yes	Yes	Yes
At most properties	Yes	At most properties	Yes
Only with exterior rooms	No	No	Varies
Yes	Determined by property	Yes	Yes
Yes	Determined by property	Yes	Yes
Per local code	Per local code	Per local code	Per local code
Per local code	Per local code	Per local code	Per local code
Per local code	Per local code	Per local code	Per local code
Per local code	Per local code	Per local code	Per local code
Per local code	Per local code	Per local code	Per local code
To central location	Per local code	Per local code	Per local code
Per local code	Per local code	Per local code	Per local code
Per local code	Per local code	Per local code	Per local code
Per local code	Per local code	Per local code	Per local code
Per local code	Per local code	Per local code	Per local code
Per local code	Per local code	Per local code	Per local code

method most travel agencies use: a CRS.

Cheap Tickets, Lowestfare, and Travelocity are powered by Sabre, the industry's largest CRS (which owns Travelocity). Expedia (owned by Microsoft) receives most of its data from a rival CRS, Worldspan. Both CRSs have access to more than 95 percent of all domestic flights. An important point: Low-fare Southwest can be accessed only through Sabre, so it's not included in Expedia's Worldspan data.

Travel web sites also obtain discounted access to airline inventory, which some-

times allows them to sell flights at fares even lower than the airline itself. As Lowestfare's Lovely says: "Effectively, we're a travel agent on steroids." His company, like many travel web sites, offers both "published fares," available to all consumers, and "contract fares," available only to consolidators and wholesalers.

Many of the contract-fare agreements between travel web sites and airlines are not public. But Lowestfare's deal with TWA is a matter of public record: The web site's chairman, Carl Icahn, is a for-

mer TWA senior executive who received access to millions of dollars in seat inventory as part of a legal settlement. In several tests, TWA flights in Lowestfare were listed for a few dollars less than flights operated by TWA or other airlines on rival travel web sites.

No doubt contract fares can provide great bargains. If you're flying into TWA's hub in St. Louis, it's likely that Lowestfare will offer a good price. But on other routes, we found that Lowestfare highlighted TWA

Continued on page 14

bigdeals

THE LATEST DEALS, HOT OFF THE PRESS

Cruise

► **Mediterranean fall cruise.** Cruise for 11 nights from Genoa, Italy, to Granada, Spain, the Canary Islands, Morocco, and Marseilles aboard the *Flamenco* at discounted rates Oct.–Dec. Starting rates (per person, double) from First European Cruises: Oct. 23 sailing, \$1,130; Nov. 3, 14, 25, \$890–\$1,140; Dec. 16–27, \$1,520–\$1,830. Meals and entertainment are included; airfare, custom fees, and port charges are extra. First European: 888-983-8767, www.first-european.com.

You save \$400–\$700, depending on date and cabin.

Golf package

► **Autumn golfing on Hilton Head.** Through Nov. 15, the oceanfront Westin Resort Hilton Head offers a “Golf ‘til You Drop” package at a starting rate of \$198 per couple per night. In addition to deluxe accommodations, the package covers one round of golf per day at the Davis Love III–designed Eagle Pointe course. The Signature Package at \$238 per couple lets you choose between the Eagle Pointe and Crescent Pointe courses, Westin: 800-937-8461, www.westin.com.

You save \$70 per night.

Domestic package

► **Rail package to New England casinos.** Major League Vacations has weekend “Amtrak Casino Express” packages to the Foxwoods and Mohegan Sun casinos in northern Connecticut. The \$69-per-day trip includes rail fare on Amtrak from Philadelphia or New York, bus transfers to the casino, and a \$30 voucher for food or betting, depending on the casino. The Friday overnight package starting at \$142 (per person, double), adds accommoda-

best buy

Holiday Caribbean cruising. **World Wide Cruises** offers discounted Christmas and New Year seven-night cruises on the *Grand Princess* from Ft. Lauderdale to St. Thomas and St. Martin. Inside cabins on the Dec. 24 sailing start at \$1,299 per person, double; \$999 for the Dec. 31 sailing. Port charges, meals, and entertainment are included, but beverages, transfers, and \$41 per person government fees are additional. **World Wide Cruises:** 800-882-9000, www.wwcruises.com.

You save at least 50%.

tions at Great Cedar Hotel in the Foxwoods complex or at Best Western Cristata Inn or Courtyard-Marriott for the Mohegan Sun casino. These packages are available for the weekends of Oct. 20, Nov. 3 and 17, and Dec. 1. Rates for single, triple, or quadruple occupancy are also available, as well as Saturday-night, two-night, and two-casino packages. Major League: 800-264-4013, www.mlv.com.

You save \$50–\$75.

Hotel

► **Free nights at Hyatt Resorts.** Hyatt Resorts’ fall “Sunshine on Sale” promotion offers free nights at 17 U.S., Hawaiian, and Caribbean locations. Rates, required length of stay, and other details vary by resort. Sample package: At the Hyatt Regency Cerramar, Puerto Rico, stay three nights and get a fourth night free, as well as one round of golf, one hour of tennis each day, and a \$25 casino “match bet,” from \$255 per couple per night through Oct. 30. Hyatt Resorts: 800-233-1234, www.hyatt.com.

You save \$115–\$350 per night, depending on location.

Travel web sites: Look around before you book

Continued from previous page

even when it wasn’t the most sensible choice. And you’re unlikely to know when that is. It’s important to note that certain travel agencies have similar contract fare deals with airlines, often on international routes.

CONCLUSION: Each web site has access to nearly all domestic fares, though we found that not all airlines were included in their listings. Each also has access to contract fares, special deals other sites may not offer, which affect listings. That’s why you need to check more than one site for the best fare and itinerary. Since these deals aren’t made clear, we can’t recommend one site over another.

For now, a user’s guide

We’ve made clear our reservations about these travel web sites. But there’s no doubt that despite their drawbacks they can offer good deals on airfares. Along the way, we picked up a few tips.

- Don’t just log onto one site; compare results from different sites against each other, and against outside sources, such as travel agents or airlines.
- Don’t confuse web-site airline ads with airline listings.
- The earlier you book, the better: Sites offer better options weeks in advance.
- If you’re often booking the same route, it helps to cross-reference timetables from the airlines serving it (available online, in ticket offices, or at the airport).
- Flexibility is key; try a range of times and alternative airports (airline timetables and web sites provide the airport codes).
- Try not to book electronic tickets on short notice; if you input a misspelled name, there may not be a record of your E-ticket, and you could be out of luck.
- Finally, note that airlines do not treat all passengers equally, as *CRTL* has repeatedly noted. For rebooking or canceling flights, compare the fees charged by web sites, travel agencies, and airlines.

For now, at least, it seems certain that increased competition means booking airfares online is going to become more difficult before it becomes easier. ■

Big Deals

CRTL’s BigDeals are limited-time promotions. To qualify for publication, they must (1) offer a comfortable level of service, (2) promise a saving of at least 15 percent off the cost of a comparable package, and (3) require only a reasonable set of restrictions. All deals are subject to restrictions, blackouts, and availability.

Travel advisories

The State Department's current list of Travel Warnings and Public Announcements

Travel Warnings, issued when the State Department recommends that Americans avoid certain countries:

Afghanistan, Albania, Algeria, Angola, Bosnia & Herzegovina, Burundi, Central African Republic, Colombia, Democratic Republic of Congo, Eritrea, Ethiopia, Guinea-Bissau, Iran, Iraq, Lebanon, Liberia, Libya, Nigeria, Pakistan, Republic of Congo, Serbia-Montenegro, Sierra Leone, Solomon Islands, Somalia, Sudan, Tajikistan, and Yemen.

Public Announcements, issued to disseminate information quickly about "terrorist threats and other relatively short-term conditions that pose significant risks or disruptions" to Americans traveling abroad:

Fiji, Israel, the West Bank, and Gaza, expires 12/16/00; Kyrgyz Republic, expires 10/15/00; Laos, expires 11/18/00; Malaysia, expires 10/24/00; Serbia-Montenegro, expires 11/17/00; South Korea, expires 11/11/00; Sri Lanka, expires 11/15/00.

Worldwide Caution: issued 6/27/00, expires 10/26/00. *Note:* This caution is "not in response to a particular threat or event," but is issued as we approach the height of the tourist season "to emphasize our ongoing concern for the security of Americans overseas."

Consult the State Department's web site at http://travel.state.gov/travel_warnings.html for further details or call its hot line at 202-647-5225. In addition to these lists, it issues Consular Information Sheets for every country in the world with information on such topics as health conditions, crime, unusual currency or entry requirements, any areas of instability, and the location of the nearest embassy or consulate.

on-time scores

report, go consumer.

AIRLINE	PERCENTAGE OF ON-TIME ARRIVALS
Northwest	75.0
Delta	73.7
Continental	73.1
Southwest	71.1
TWA	66.6
American	65.5
Alaska	65.5
US Airways	63.3
America West	60.5
United	48.3

How well traveled are you?

Code Breakers

You see them slathered across your garment bag when you pull it off the baggage carousel: the airline industry's three-letter airport codes. But have you committed any of them to memory? Test your travel knowledge with the quiz below.

- | | |
|---------|--------------------------|
| 1. ACK | A) Fresno, Calif. |
| 2. AZO | B) Portland, Me. |
| 3. BDL | C) Portland, Ore. |
| 4. BNA | D) Sacramento, Calif. |
| 5. CVG | E) Kansas City, Mo. |
| 6. FAT | F) Pittsburgh |
| 7. ITO | G) Orange County, Calif. |
| 8. JAX | H) Nantucket, Mass. |
| 9. MCI | I) Nashville, Tenn. |
| 10. MCO | J) Hartford, Conn. |
| 11. MSY | K) New Orleans |
| 12. OAJ | L) Jacksonville, Fla. |
| 13. PBI | M) Jacksonville, N.C. |
| 14. PDX | N) Hilo, Hawaii |
| 15. PIT | O) Kalamazoo, Mich. |
| 16. PWM | P) San Jose, Calif. |
| 17. SAC | Q) Orlando, Fla. |
| 18. SAN | R) San Diego |
| 19. SJC | S) Cincinnati |
| 20. SNA | T) West Palm Beach, Fla. |

ANSWERS:

1) H; 2) O; 3) J; 4) N; 5) S; 6) A; 7) M; 8) L; 9) E; 10) Q; 11) K; 12) M; 13) T; 14) C; 15) D; 16) B; 17) I; 18) R; 19) P; 20) G

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 reservations & refunds 4 Jan 00
 seats 1 Jan 00, 1 Sept 00
 unaccompanied minors 1 Sept 00

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..... 3 Jul 00

Bed-and-breakfasts

..... 12 Dec 99

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Best travel deals, '00

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The Index covers the 12 most recent issues. For a back issue, send \$5 per issue to CRTL, 101 Truman Ave., Yonkers, NY 10703-1057.

talkback

OUR READERS WRITE

Not a minor problem

I reserved a round-trip flight on Southwest Airlines for my son, who is 12 years old. I checked first on the Internet, which said I needed to make the reservation over the phone if it was for a minor. I called the 800 number and made the reservation. Two months later, as we were checking in, I was informed that my son was not considered a minor and would not be given any special status. He was to fly solo without any particular attention.

Why didn't anyone tell me this before check-in time? I would not have put my son in this situation intentionally. When he flew previously with another airline, we were told that the unaccompanied-minor status was for children under age 14. I assumed that this age was an industry standard, and did not think to question it at Southwest.

—Bonnie Yoshinobu
Marina, Calif.

Editor's Note: The major airlines have slightly different age requirements for providing unaccompanied-minor service (see our Special Report, "Pre-

cious Cargo," Sept. 2000). Southwest's cutoff age is 11. It's a good idea to ask the airline as you're making a reservation whether your child qualifies for this service.

'Resorting' to hidden fees

Here's a new way for hotels to hide a rate increase: a "resort fee" on your bill. This appeared on my Westin hotel bills on several occasions when I checked out, and upon inquiry, I was told that this included "free" local phone calls (I'd never made any), a "free newspaper," and "free" use of resort facilities (I didn't use any of these—the spa, exercise room, etc.).

When I was told in advance about the resort fee, I advised them that I had no intention of utilizing any of the items they described but was told it was not optional to decline it. I told them it was unfair to add \$8 to \$10 a day to their room rates for services many travelers don't benefit from. One cashier stated it was a way to increase rates without increasing the room tax! In several instances, I opted for another hotel.

—M.D. Crow
Honolulu

Big bird, big issues

In your August issue, you had an article concerning the new "big bird"—the Airbus A-3XX. I wonder if airlines even consider the impact on passengers when they consider buying such a large aircraft.

I have traveled all over the world and know of no boarding area that would accommodate 550 passengers. In cases of flight delays, even today's problems are astronomical. However, the problem is even greater with arrivals at foreign airports. Going through immigration and passport controls is lengthy enough, even with the 747 and "only" 350 passengers. When several planes arrive at the same time, the situation is horrible, especially on Sundays. If one has to wait in line for currency, it can take an hour or more; there is also checking in, boarding, and luggage retrieval. Unless these matters are

given attention prior to the building of the plane, the catastrophe can be foreseen.

—Henry K. Griesman
New York

Airbus squeeze

My husband and I flew Air France's new Airbus from Atlanta to Paris last month, and it was the most uncomfortable flight we've ever taken. The seats themselves were comfortable, but the pitch was so tight, especially when those in front reclined their seats, that one had to somehow turn over in the seat and crawl out to get to the aisle.

I find the idea of the airline industry's buying more of these planes frightening. Is there no way to convince the airlines to keep at least some of the seats upright if they are going to keep the space so tight?

—Marcella Huguelet
Sylva, N.C.

Talk Back

You're invited to submit comments, tips, and strategies based on your own experience. They should be of general interest. *CRTL* cannot use recommendations for individual hotels or restaurants and cannot answer questions about individual trips. We cannot acknowledge all inquiries, answer all questions, or return submissions. Letters may be edited for clarity and length. Mail material to *CRTL*, 101 Truman Ave., Yonkers, N.Y. 10703-1057, e-mail to talkback@travel.consumer.org, or fax to 914-378-2919. Please include a daytime phone number.

CONSUMER REPORTS TRAVEL LETTER/October 2000

“Travel Web Sites: Look Around Before You Book”

TESTING:

- Nine test sessions were conducted during the week of 31 July 2000, at various times of the day and week.
- Testing was done simultaneously on all four web sites (Cheap Tickets, Expedia, Lowestfare, and Travelocity) and on the Apollo Galileo computer reservations system.
- Identical itineraries were scripted for each route, with departure times varying from 24 hours in advance to four months in advance.

SPREAD SHEET KEY:

- All amounts rounded to nearest dollar.
- All results represent first flights listed on each route.
- The lowest fare for each route indicated on chart was selected from multiple itineraries (due to three major airports in New York and two major airports in Chicago, there were a total of 19 possible itineraries for the six routes).
- X indicates tests that did not produce conclusive results.
- CANNOT PROCESS indicates tests that could not be processed due to ticket mailing restrictions (on Cheap Tickets).
- Semicolon indicates two or more airlines with tie fares.
- Ampersand indicates interline itineraries on two or more airlines.

SESSION #1 ROUTING	APOLLO RESULTS	WEB SITE	AIRLINE	FARE	VIABLE FLIGHT?	VIABLE AND LOWER THAN APOLLO?
New York-Los Angeles	America West/ \$1,218	CHEAP TICKETS	X	X		
		EXPEDIA	National	\$450	NO	NO
		LOWESTFARE	America West	\$314	NO	NO
		TRAVELOCITY	Frontier, American Trans Air	\$1,227	NO	NO
New York-Fort Lauderdale	JetBlue/\$269	CHEAP TICKETS	X	X		
		EXPEDIA	Continental	\$195	NO	NO
		LOWESTFARE	TWA	\$219	NO	NO
		TRAVELOCITY	Delta	\$1,121	NO	NO
New York-Orlando	US Airways/\$161	CHEAP TICKETS	X	X		
		EXPEDIA	Continental	\$129	YES	YES
		LOWESTFARE	TWA	\$129	NO	NO
		TRAVELOCITY	US Airways; JetBlue	\$443	NO; NO	NO
Chicago-Denver	United/\$596	CHEAP TICKETS	X	X		
		EXPEDIA	American Trans Air	\$560	NO	NO
		LOWESTFARE	TWA	\$297	NO	NO
		TRAVELOCITY	American Trans Air	\$800	NO	NO
Chicago-Las Vegas	National/\$309	CHEAP TICKETS	X	X		
		EXPEDIA	America West; National	\$309	YES; YES	SAME
		LOWESTFARE	National	\$254	YES	YES
		TRAVELOCITY	American; Southwest	\$523	YES	NO
New York-Chicago	American Trans Air/ \$613	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	AirTran	\$524	YES	YES
		LOWESTFARE	AirTran	\$564	NO	NO
		TRAVELOCITY	American Trans Air; US Airways	\$777	NO	NO

SESSION #2 ROUTING	APOLLO RESULTS	WEB SITE	AIRLINE	FARE	VIABLE FLIGHT?	VIABLE AND LOWER THAN APOLLO?
New York-Los Angeles	America West/ \$1,215	CHEAP TICKETS	X	X		
		EXPEDIA	National	\$450	NO	NO
		LOWESTFARE	America West	\$548	NO	NO
		TRAVELOCITY	American Trans Air	\$662	NO	NO
New York-Fort Lauderdale	JetBlue/\$289	CHEAP TICKETS	X	X		
		EXPEDIA	Midway	\$232	YES	YES
		LOWESTFARE	TWA	\$219	NO	NO
		TRAVELOCITY	JetBlue	\$269	NO	NO
New York-Orlando	US Airways/\$161	CHEAP TICKETS	X	X		
		EXPEDIA	Continental	\$129	YES	YES
		LOWESTFARE	TWA	\$124	NO	NO
		TRAVELOCITY	AirTran	\$157	YES	YES
Chicago-Denver	United/\$596	CHEAP TICKETS	X	X		
		EXPEDIA	Frontier	\$491	YES	YES
		LOWESTFARE	TWA	\$341	NO	NO
		TRAVELOCITY	Vanguard	\$359	YES	YES
Chicago-Las Vegas	National/\$309	CHEAP TICKETS	X	X		
		EXPEDIA	America West; National	\$309	YES; YES	SAME
		LOWESTFARE	National	\$254	YES	YES
		TRAVELOCITY	American; National	\$309	YES; YES	SAME
New York-Chicago	American Trans Air/ \$613	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	AirTran	\$464	YES	YES
		LOWESTFARE	AirTran	\$484	NO	NO
		TRAVELOCITY	Pro Air & AirTran	\$449	NO	NO

SESSION #3 ROUTING	APOLLO RESULTS	WEB SITE	AIRLINE	FARE	VIABLE FLIGHT?	VIABLE AND LOWER THAN APOLLO?
New York-Los Angeles	National/\$964	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	X	X		
		LOWESTFARE	American Trans Air	\$662	NO	NO
		TRAVELOCITY	American Trans Air	\$662	NO	NO
New York-Fort Lauderdale	Spirit/\$269	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	X	X		
		LOWESTFARE	TWA	\$265	NO	NO
		TRAVELOCITY	Continental	\$269	NO	NO
New York-Orlando	AirTran/\$140	CHEAP TICKETS	X	X		
		EXPEDIA	X	X		
		LOWESTFARE	TWA	\$124	NO	NO
		TRAVELOCITY	US Airways; TWA	\$161	NO; NO	NO
Chicago-Denver	Vanguard/\$359	CHEAP TICKETS	X	X		
		EXPEDIA	United	\$695	YES	NO
		LOWESTFARE	TWA	\$341	NO	NO
		TRAVELOCITY	Vanguard	\$359	YES	SAME
Chicago-Las Vegas	National/\$309	CHEAP TICKETS	X	X		
		EXPEDIA	Continental	\$309	NO	NO
		LOWESTFARE	National	\$254	YES	YES
		TRAVELOCITY	America West; National	\$309	YES; YES	SAME
New York-Chicago	American Trans Air/ \$613	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	AirTran	\$524	NO	NO
		LOWESTFARE	American Trans Air	\$662	NO	NO
		TRAVELOCITY	Pro Air & AirTran	\$449	NO	NO

SESSION #4 ROUTING	APOLLO RESULTS	WEB SITE	AIRLINE	FARE	VIABLE FLIGHT?	VIABLE AND LOWER THAN APOLLO?
New York-Los Angeles	National/\$764	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	American Trans Air	\$535	NO	NO
		LOWESTFARE	Frontier	\$710	NO	NO
		TRAVELOCITY	American Trans Air	\$532	NO	NO
New York-Fort Lauderdale	Spirit/\$269	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	X	X		
		LOWESTFARE	TWA	\$232	NO	NO
		TRAVELOCITY	X	X		
New York-Orlando	AirTran/\$140	CHEAP TICKETS	Continental	\$129	NO	NO
		EXPEDIA	Midway	\$129	YES	YES
		LOWESTFARE	TWA	\$124	NO	NO
		TRAVELOCITY	X	X		
Chicago-Denver	Vanguard/\$359	CHEAP TICKETS	TWA	\$334	NO	NO
		EXPEDIA	Northwest	\$482	NO	NO
		LOWESTFARE	TWA	\$341	NO	NO
		TRAVELOCITY	Vanguard	\$359	YES	SAME
Chicago-Las Vegas	National/\$309	CHEAP TICKETS	American Trans Air	\$260	YES	YES
		EXPEDIA	X	X		
		LOWESTFARE	National	\$254	YES	YES
		TRAVELOCITY	America West; National	\$309	YES; YES	SAME
New York-Chicago	American Trans Air/ \$613	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	AirTran	\$524	NO; NO	NO
		LOWESTFARE	American Trans Air	\$613	NO	NO
		TRAVELOCITY	Pro Air & AirTran	\$479	NO	NO

SESSION #5 ROUTING	APOLLO RESULTS	WEB SITE	AIRLINE	FARE	VIABLE FLIGHT?	VIABLE AND LOWER THAN APOLLO?
New York-Los Angeles	National/\$384	CHEAP TICKETS	America West	\$421	NO	NO
		EXPEDIA	America West	\$416	YES	NO
		LOWESTFARE	America West	\$299	NO	NO
		TRAVELOCITY	National	\$384	YES	SAME
New York-Fort Lauderdale	Spirit/\$289	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	Continental	\$215	NO	NO
		LOWESTFARE	Midway	\$169	YES	YES
		TRAVELOCITY	Continental	\$249	NO	NO
New York-Orlando	Spirit/\$129	CHEAP TICKETS	Continental	\$129	NO	NO
		EXPEDIA	Midway	\$129	YES	SAME
		LOWESTFARE	TWA	\$124	NO	NO
		TRAVELOCITY	US Airways, TWA	\$161	NO	NO
Chicago-Denver	Vanguard/\$359	CHEAP TICKETS	TWA	\$296	NO	NO
		EXPEDIA	Frontier	\$297	NO	NO
		LOWESTFARE	TWA	\$297	NO	NO
		TRAVELOCITY	Vanguard	\$359	YES	SAME
Chicago-Las Vegas	National/\$309	CHEAP TICKETS	Continental	\$309	YES	SAME
		EXPEDIA	Continental; National	\$309	YES; YES	SAME
		LOWESTFARE	National	\$254	YES	YES
		TRAVELOCITY	American; National	\$309	YES; YES	SAME
New York-Chicago	American Trans Air/ \$637	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	AirTran	\$524	NO	NO
		LOWESTFARE	AirTran	\$524	NO	NO
		TRAVELOCITY	Pro Air	\$434	NO	NO

SESSION #6 ROUTING	APOLLO RESULTS	WEB SITE	AIRLINE	FARE	VIABLE FLIGHT?	VIABLE AND LOWER THAN APOLLO?
New York-Los Angeles	American/\$429	CHEAP TICKETS	America West	\$423	NO	NO
		EXPEDIA	Northwest	\$422	YES	YES
		LOWESTFARE	TWA	\$325	NO	NO
		TRAVELOCITY	American; Continental	\$429	YES; YES	SAME
New York-Fort Lauderdale	Spirit/\$289	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	Continental	\$252	NO	NO
		LOWESTFARE	Continental	\$269	NO	NO
		TRAVELOCITY	Continental	\$269	NO	NO
New York-Orlando	Spirit/\$129	CHEAP TICKETS	Continental	\$129	NO	NO
		EXPEDIA	Midway	\$129	YES	SAME
		LOWESTFARE	TWA	\$124	NO	NO
		TRAVELOCITY	US Airways; TWA	\$161	NO	NO
Chicago-Denver	Vanguard/\$469	CHEAP TICKETS	TWA	\$334	NO	NO
		EXPEDIA	Frontier	\$297	NO	NO
		LOWESTFARE	TWA	\$341	NO	NO
		TRAVELOCITY	Vanguard	\$469	YES	SAME
Chicago-Las Vegas	America West/\$309	CHEAP TICKETS	America West; American Trans Air	\$309	YES; YES	SAME
		EXPEDIA	America West; National	\$309	YES; YES	SAME
		LOWESTFARE	America West	\$309	YES	SAME
		TRAVELOCITY	America West; National	\$309	YES; YES	SAME
New York-Chicago	American Trans Air/ \$637	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	AirTran	\$524	NO	NO
		LOWESTFARE	AirTran	\$564	NO	NO
		TRAVELOCITY	Pro Air	\$434	NO	NO

SESSION #7 ROUTING	APOLLO RESULTS	WEB SITE	AIRLINE	FARE	VIABLE FLIGHT?	VIABLE AND LOWER THAN APOLLO?
New York-Los Angeles	National/\$484	CHEAP TICKETS	America West	\$471	NO	NO
		EXPEDIA	American Trans Air	\$492	YES	NO
		LOWESTFARE	America West	\$299	NO	NO
		TRAVELOCITY	American Trans Air	\$434	NO	NO
New York-Fort Lauderdale	Spirit/\$289	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	Continental	\$215	NO	NO
		LOWESTFARE	Continental	\$249	NO	NO
		TRAVELOCITY	Delta	\$294	NO	NO
New York-Orlando	Spirit/\$129	CHEAP TICKETS	Continental	\$129	NO	NO
		EXPEDIA	Midway	\$129	YES	SAME
		LOWESTFARE	TWA	\$124	NO	NO
		TRAVELOCITY	US Airways; TWA	\$161	NO	NO
Chicago-Denver	Vanguard/\$342	CHEAP TICKETS	TWA	\$334	NO	NO
		EXPEDIA	Northwest	\$441	NO	NO
		LOWESTFARE	TWA	\$341	NO	NO
		TRAVELOCITY	Vanguard	\$469	YES	NO
Chicago-Las Vegas	America West. National/\$309	CHEAP TICKETS	American Trans Air	\$260	YES	YES
		EXPEDIA	America West	\$309	YES	SAME
		LOWESTFARE	National	\$254	YES	YES
		TRAVELOCITY	America West; National	\$309	YES; YES	SAME
New York-Chicago	American Trans Air/ \$388	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	American Trans Air	\$388	YES	SAME
		LOWESTFARE	American Trans Air	\$313	NO	NO
		TRAVELOCITY	American Trans Air	\$313	NO	NO

SESSION #8 ROUTING	APOLLO RESULTS	WEB SITE	AIRLINE	FARE	VIABLE FLIGHT?	VIABLE AND LOWER THAN APOLLO?
New York-Los Angeles	National/\$494	CHEAP TICKETS	America West	\$471	NO	NO
		EXPEDIA	Frontier	\$472	NO	NO
		LOWESTFARE	America West	\$321	NO	NO
		TRAVELOCITY	National	\$444	YES	YES
New York-Fort Lauderdale	Spirit/\$289	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	Continental	\$215	NO	NO
		LOWESTFARE	Continental	\$249	NO	NO
		TRAVELOCITY	Continental	\$249	NO	NO
New York-Orlando	Continental/\$129	CHEAP TICKETS	Delta	\$163	NO	NO
		EXPEDIA	Midway	\$129	YES	SAME
		LOWESTFARE	TWA	\$124	NO	NO
		TRAVELOCITY	US Airways; TWA	\$161	NO; NO	NO
Chicago-Denver	Vanguard/\$422	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	Northwest	\$441	NO	NO
		LOWESTFARE	TWA	\$341	NO	NO
		TRAVELOCITY	Vanguard	\$378	NO	NO
Chicago-Las Vegas	National; America West/\$309	CHEAP TICKETS	America West	\$309	YES	SAME
		EXPEDIA	America West; National	\$309	YES; YES	SAME
		LOWESTFARE	National	\$254	YES	YES
		TRAVELOCITY	America West; National	\$309	YES; YES	SAME
New York-Chicago	American Trans Air/ \$261	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	American Trans Air	\$313	YES	NO
		LOWESTFARE	American Trans Air	\$261	YES	SAME
		TRAVELOCITY	American Trans Air	\$261	YES	SAME

SESSION #9 ROUTING	APOLLO RESULTS	WEB SITE	AIRLINE	FARE	VIABLE FLIGHT?	VIABLE AND LOWER THAN APOLLO?
New York-Los Angeles	National/\$444	CHEAP TICKETS	America West	\$471	NO	NO
		EXPEDIA	National	\$444	NO	NO
		LOWESTFARE	America West	\$321	NO	NO
		TRAVELOCITY	National	\$444	YES	SAME
New York-Fort Lauderdale	Spirit/\$289	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	Continental	\$215	NO	NO
		LOWESTFARE	Midway	\$169	YES	YES
		TRAVELOCITY	Continental	\$249	NO	NO
New York-Orlando	Continental/\$129	CHEAP TICKETS	Continental	\$129	NO	NO
		EXPEDIA	Midway	\$129	YES	SAME
		LOWESTFARE	TWA	\$124	NO	NO
		TRAVELOCITY	US Airways; TWA	\$161	NO; NO	NO
Chicago-Denver	Vanguard/\$422	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	United	\$785	YES	NO
		LOWESTFARE	TWA	\$341	NO	NO
		TRAVELOCITY	Vanguard	\$378	NO	NO
Chicago-Las Vegas	National/\$309	CHEAP TICKETS	American Trans Air	\$260	YES	YES
		EXPEDIA	America West; National	\$309	YES; YES	SAME
		LOWESTFARE	National	\$254	YES	YES
		TRAVELOCITY	America West; National	\$309	YES; YES	SAME
New York-Chicago	American Trans Air/ \$388	CHEAP TICKETS	*CANNOT PROCESS*	*CANNOT PROCESS*		
		EXPEDIA	American Trans Air	\$313	YES	YES
		LOWESTFARE	American Trans Air	\$313	YES	YES
		TRAVELOCITY	American Trans Air	\$313	YES	YES